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August 22, 2025

**VIA ECF**

Honorable James R. Cho  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Charles Saldarriaga v. City of New York, et al.,  
25-CV-1115 (RPK)(JRC)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney assigned to the defense in the above-referenced matter. I write on behalf of Detective Leonardo Moscoso to respectfully request an extension of time to answer or otherwise respond to Plaintiff's Complaint, from August 25, 2025, to September 4, 2025. The undersigned sincerely apologizes for this late application. This is Defendant Moscoso's first request for an extension of time. Plaintiff consents to this request.

By way of background, Plaintiff, who is proceeding *pro se*, filed his Complaint on February 26, 2025, naming as defendants the City of New York, Sergeant Detective William J. Planeta, Detective Leonardo Moscoso, Officer Mohammad F. Hossain, and Detective Eric Bolger. (ECF No. 1). On June 30, 2025, Your Honor Ordered Defendants Bolger, Sergeant Detective Planeta, and the City to answer or otherwise respond to Plaintiff's Complaint by September 4, 2025. On August 14, 2025, the Court's Docket was updated to reflect that the Summons was returned executed in relation to Detective Moscoso on August 11, 2025, and that he is due to answer by August 25, 2025. (ECF No. 26).

The reason for this request is to align Defendant Moscoso's deadline to answer or respond with that of Defendants Bolger, Planeta, and the City. Coordinating their deadlines will allow those Defendants to file a single, unified response to the Complaint, conserve time and resources for both parties, and help promote judicial and procedural efficiency by minimizing court filings and multiple deadlines.

Therefore, Defendant Moscoso respectfully requests the Court grant him an extension of time to answer or otherwise respond to Plaintiff's Complaint until September 4, 2025, the same date on which Defendants Bolger, Planeta, and the City's response is due.

Defendant once again sincerely apologizes for the lateness of this application and thanks the Court for its time and consideration of this matter.

Respectfully submitted,

*Michael Futral /s/*

Michael Futral

*Assistant Corporation Counsel*

Special Federal Litigation Division

Cc: **VIA ECF & FIRST CLASS MAIL**

Charles Saldarriaga

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